

Message

**From:** Beck, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=168ECB5184AC44DE95A913297F353745-BECK, NANCY]  
**Sent:** 11/16/2018 1:08:34 PM  
**To:** Henry, Tala [Henry.Tala@epa.gov]  
**CC:** Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [baptist.erik@epa.gov]; Morris, Jeff [Morris.Jeff@epa.gov]; Scheifele, Hans [Scheifele.Hans@epa.gov]  
**Subject:** RE: Administrator TSCA-related comment for PFAS management plan

Ok. but according to that report, the number includes intentionally and unintentionally produced PFAS. Is that correct??  
If so, we need to be very clear that some of these are not necessarily manufactured for use as is..

"Therefore, PFASs that are on the global market and in the environment consist of intentionally produced substances and unintentionally generated substances (i.e. unreacted residuals, by-products, and degradation intermediates)."

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Nancy B. Beck, Ph.D., DABT  
Deputy Assistant Administrator, OCSPP  
P: 202-564-1273  
[beck.nancy@epa.gov](mailto:beck.nancy@epa.gov)

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**From:** Henry, Tala  
**Sent:** Friday, November 16, 2018 8:03 AM  
**To:** Beck, Nancy <[Beck.Nancy@epa.gov](mailto:Beck.Nancy@epa.gov)>  
**Cc:** Bertrand, Charlotte <[Bertrand.Charlotte@epa.gov](mailto:Bertrand.Charlotte@epa.gov)>; Baptist, Erik <[baptist.erik@epa.gov](mailto:baptist.erik@epa.gov)>; Morris, Jeff <[Morris.Jeff@epa.gov](mailto:Morris.Jeff@epa.gov)>; Scheifele, Hans <[Scheifele.Hans@epa.gov](mailto:Scheifele.Hans@epa.gov)>  
**Subject:** RE: Administrator TSCA-related comment for PFAS management plan

The oecd report # is 4730, **Deliberative Process / Ex. 5**

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**From:** Beck, Nancy  
**Sent:** Thursday, November 15, 2018 9:03 PM  
**To:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Cc:** Bertrand, Charlotte <[Bertrand.Charlotte@epa.gov](mailto:Bertrand.Charlotte@epa.gov)>; Baptist, Erik <[Baptist.Erik@epa.gov](mailto:Baptist.Erik@epa.gov)>; Morris, Jeff <[Morris.Jeff@epa.gov](mailto:Morris.Jeff@epa.gov)>; Scheifele, Hans <[Scheifele.Hans@epa.gov](mailto:Scheifele.Hans@epa.gov)>  
**Subject:** RE: Administrator TSCA-related comment for PFAS management plan

Thanks the OECD report is helpful. **Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

Thanks.

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**From:** Henry, Tala  
**Sent:** Thursday, November 15, 2018 7:43 PM  
**To:** Beck, Nancy <[Beck.Nancy@epa.gov](mailto:Beck.Nancy@epa.gov)>  
**Cc:** Bertrand, Charlotte <[Bertrand.Charlotte@epa.gov](mailto:Bertrand.Charlotte@epa.gov)>; Baptist, Erik <[baptist.erik@epa.gov](mailto:baptist.erik@epa.gov)>; Morris, Jeff <[Morris.Jeff@epa.gov](mailto:Morris.Jeff@epa.gov)>; Scheifele, Hans <[Scheifele.Hans@epa.gov](mailto:Scheifele.Hans@epa.gov)>  
**Subject:** RE: Administrator TSCA-related comment for PFAS management plan

In which set?

The TSCA Inv and Active are actual chemicals manufactured of course.

The 4730 number comes a 2018 OECD document (attached) that updates a 2007 list – it is a list of lists (from a bunch of countries inventories);

The chemicals on the OECD list ALL have CASRNs...however, the OECD database includes all PFAS that may have been present on the global market, not just those that actually were present on the marketplace. Further, OECD notes: "PFASs that are on the global market and in the environment consist of intentionally produced substances and unintentionally generated substances (i.e. unreacted residuals, by-products, and degradation intermediates). The original intention of this study was to focus on identifying PFASs that have been produced for commercial uses (as registered under many national/regional chemical inventories). However, during the development of the list, it was noted that some sources do not have such a clear indication (for details, see Table 2 below). Therefore, a clear labelling of PFASs with respect to their origins (e.g., produced for commercial uses, produced for research purposes, unintentionally generated) cannot be made in this study;..."

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**From:** Beck, Nancy  
**Sent:** Thursday, November 15, 2018 6:25 PM  
**To:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Cc:** Bertrand, Charlotte <[Bertrand.Charlotte@epa.gov](mailto:Bertrand.Charlotte@epa.gov)>; Baptist, Erik <[Baptist.Erik@epa.gov](mailto:Baptist.Erik@epa.gov)>; Morris, Jeff <[Morris.Jeff@epa.gov](mailto:Morris.Jeff@epa.gov)>; Scheifele, Hans <[Scheifele.Hans@epa.gov](mailto:Scheifele.Hans@epa.gov)>  
**Subject:** Re: Administrator TSCA-related comment for PFAS management plan

Is it possible many of the identified products are not actually manufactured but are metabolites or breakdown products?  
If true, is there a way to characterize that?

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On Nov 15, 2018, at 5:43 PM, Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)> wrote:

It is true that OW was assuming mutual exclusivity, which we know is not true...they realized it when I pinged them to ask where they got their #s.

# Deliberative Process / Ex. 5

# Deliberative Process / Ex. 5

**From:** Beck, Nancy  
**Sent:** Thursday, November 15, 2018 5:32 PM  
**To:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Cc:** Bertrand, Charlotte <[Bertrand.Charlotte@epa.gov](mailto:Bertrand.Charlotte@epa.gov)>; Baptist, Erik <[Baptist.Erik@epa.gov](mailto:Baptist.Erik@epa.gov)>; Morris, Jeff <[Morris.Jeff@epa.gov](mailto:Morris.Jeff@epa.gov)>  
**Subject:** Re: Administrator TSCA-related comment for PFAS management plan

It's on my list. What is the response to Jeff's very good question?

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Nancy B. Beck, Ph.D., DABT  
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Office of Chemical Safety and Pollution Prevention  
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On Nov 15, 2018, at 5:26 PM, Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)> wrote:

I sent you all our proposed edits to the chart in email at yesterday @ 1:03 pm ...OW awaits our input.

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**From:** Holsinger, Hannah  
**Sent:** Thursday, November 15, 2018 4:36 PM  
**To:** Albert, Ryan <[Albert.Ryan@epa.gov](mailto:Albert.Ryan@epa.gov)>; Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Cc:** Wadlington, Christina <[Wadlington.Christina@epa.gov](mailto:Wadlington.Christina@epa.gov)>; Scheifele, Hans <[Scheifele.Hans@epa.gov](mailto:Scheifele.Hans@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Krasnic, Toni <[krasnic.toni@epa.gov](mailto:krasnic.toni@epa.gov)>; Strauss, Linda <[Strauss.Linda@epa.gov](mailto:Strauss.Linda@epa.gov)>; Lan, Alexis <[lan.alexis@epa.gov](mailto:lan.alexis@epa.gov)>  
**Subject:** RE: Administrator TSCA-related comment for PFAS management plan

Hi Tala,  
Following up on Ryan's email to see the status of your edits. We are incorporating the remaining edits this afternoon.

Thanks!  
Hannah

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**From:** Albert, Ryan  
**Sent:** Wednesday, November 14, 2018 3:25 PM  
**To:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Cc:** Wadlington, Christina <[Wadlington.Christina@epa.gov](mailto:Wadlington.Christina@epa.gov)>; Holsinger, Hannah <[Holsinger.Hannah@epa.gov](mailto:Holsinger.Hannah@epa.gov)>; Scheifele, Hans <[Scheifele.Hans@epa.gov](mailto:Scheifele.Hans@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Krasnic, Toni <[krasnic.toni@epa.gov](mailto:krasnic.toni@epa.gov)>; Strauss, Linda <[Strauss.Linda@epa.gov](mailto:Strauss.Linda@epa.gov)>; Lan, Alexis <[lan.alexis@epa.gov](mailto:lan.alexis@epa.gov)>  
**Subject:** RE: Administrator TSCA-related comment for PFAS management plan

Hi Tala,

Thank you for your review, intending to provide edits, and your question. In regards to the question:

- The numbers were derived from OPPT's internal summary report (dated September 5<sup>th</sup>, 2018) and OECD's global database on PFAS. Both reports are attached.

## Deliberative Process / Ex. 5

- Upon reexamining the numbers in the figure in light of your question, we noted we assumed numbers in the figure represented a binary situation; i.e., the numbers inside the United States and outside the United States were presented as though they are mutually exclusive. However, we recognize this may be a mischaracterization as some compounds may be produced both inside and outside the U.S. Hence, we may need to remove the 3,560 number or recharacterize how that number is presented.
- **We welcome OPPT's feedback on how these figures should be characterized and summarized in the graphic.**

Please let us know if you have any additional questions or need any additional information.

Best regards,  
Ryan

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Acting Chief, Standards and Risk Reduction Branch  
Standards and Risk Management Division  
Office of Ground Water and Drinking Water  
U.S. Environmental Protection Agency  
Washington, DC  
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**From:** Henry, Tala  
**Sent:** Wednesday, November 14, 2018 2:35 PM  
**To:** Albert, Ryan <[Albert.Ryan@epa.gov](mailto:Albert.Ryan@epa.gov)>  
**Cc:** Wadlington, Christina <[Wadlington.Christina@epa.gov](mailto:Wadlington.Christina@epa.gov)>; Holsinger, Hannah <[Holsinger.Hannah@epa.gov](mailto:Holsinger.Hannah@epa.gov)>; Scheifele, Hans <[Scheifele.Hans@epa.gov](mailto:Scheifele.Hans@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Krasnic, Toni <[krasnic.toni@epa.gov](mailto:krasnic.toni@epa.gov)>; Strauss, Linda <[Strauss.Linda@epa.gov](mailto:Strauss.Linda@epa.gov)>; Lan, Alexis <[lan.alexis@epa.gov](mailto:lan.alexis@epa.gov)>  
**Subject:** RE: Administrator TSCA-related comment for PFAS management plan  
**Importance:** High

Hi,

We are reviewing this now and have some edits; however, can you please advise as to the source of the numbers in the pie chart??

Tala R. Henry, Ph.D.  
Acting Deputy Director  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency

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**From:** Albert, Ryan  
**Sent:** Tuesday, November 13, 2018 8:34 PM  
**To:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Cc:** Wadlington, Christina <[Wadlington.Christina@epa.gov](mailto:Wadlington.Christina@epa.gov)>; Holsinger, Hannah <[Holsinger.Hannah@epa.gov](mailto:Holsinger.Hannah@epa.gov)>; Scheifele, Hans <[Scheifele.Hans@epa.gov](mailto:Scheifele.Hans@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Krasnic, Toni <[krasnic.toni@epa.gov](mailto:krasnic.toni@epa.gov)>; Strauss, Linda <[Strauss.Linda@epa.gov](mailto:Strauss.Linda@epa.gov)>; Lan, Alexis <[lan.alexis@epa.gov](mailto:lan.alexis@epa.gov)>  
**Subject:** Administrator TSCA-related comment for PFAS management plan

Hi Tala,

We received the Acting Administrator's comments on the PFAS management plan today. There was one to-do that was related to the TSCA program. In the PFAS exposure section (line 343 of the attached plan), the Acting Administrator noted:

## Deliberative Process / Ex. 5

After consulting with our team, including Christina Wadlington, we believe the draft graphic Christina sent you early this morning likely meets the Acting Administrator's objectives. I am forwarding her note here and the graphic for your consideration.

We welcome your feedback on the graphic and input as to whether, in your opinion, we are missing key detailed information in this section you would recommend briefly adding that furthers the AA Wheeler's objectives.

Please note I am also cc'ing Hannah Holsinger here to ensure she stays in the loop (she is on international travel through Thursday and deserves an evening or two to herself). We would be most grateful for any comments on the attached, or fleshed-out alternate recommended approach, by COB tomorrow (Wednesday 11/14) if possible.

Please let us know if you have any questions or if you need any additional information.

Best regards,  
Ryan

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Ryan Albert, Ph.D.

Acting Chief, Standards and Risk Reduction Branch  
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**From:** Wadlington, Christina  
**Sent:** Tuesday, November 13, 2018 7:51 AM  
**To:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>; Krasnic, Toni <[krasnic.toni@epa.gov](mailto:krasnic.toni@epa.gov)>; Strauss, Linda <[Strauss.Linda@epa.gov](mailto:Strauss.Linda@epa.gov)>  
**Cc:** Scheifele, Hans <[Scheifele.Hans@epa.gov](mailto:Scheifele.Hans@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>  
**Subject:** Graphic for the PFAS Management Plan

Morning!

We are putting together a few graphics for the PFAS management plan. Can you please take a look at the below and provide edits/thoughts?

PS I understand that the numbers update, if it's helpful we can add a "as of" date to the bottom to ensure it reflects the accurate numbers.

<image001.png>

Thank you.